

**FILED**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JUN 22 2016  
U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. ) No.  
 )  
Alden Dickerman, )  
 )  
Defendant. )

**4:16CR258 CEJ/NAB**

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

- (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
- (b) "sexually explicit conduct" to mean actual or simulated
  - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,
  - (ii) bestiality,
  - (iii) masturbation,
  - (iv) sadistic or masochistic abuse, or
  - (v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. §2256(2)(A)); and

- (c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));
- (d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--
  - (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or
  - (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about April 1, 2015, and August 18, 2015, in the Eastern District of Missouri, and elsewhere,

**ALDEN DICKERMAN,**

the defendant herein, did knowingly possess material that contains an image and video of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, Hitachi Hard Drive that were produced outside of Missouri and therefore has traveled in

interstate and foreign commerce, and said hard drive contained child pornography, including but not limited to the following:

- 1) “1-2.wmv” – a graphic video file of a male attempting to penetrate the genitals of a prepubescent minor female;
- 2) “BabyJ-Helping.mpg” – a graphic video file of a male attempting to penetrate the genitals of a prepubescent minor female;
- 3) “Laura Pussy Fuck.mpg” – a graphic video file of a male attempting to penetrate the genitals of a prepubescent minor female;
- 4) “ZOE\_0033.jpg” – a graphic image file of a male attempting to penetrate the genitals of a prepubescent minor (possibly toddler aged) female;
- 5) “00\_DSC05529JP\_5089376\_12645151.jpg” – a graphic image file of a prepubescent minor female in a lascivious display of her genitals.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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Assistant United States Attorney